

NICHOLAS J. SANTORO, ESQ.
Nevada Bar No. 0532
nsantoro@santoronevada.com
SANTORO WHITMIRE
10100 W. Charleston Boulevard
Suite 250
Las Vegas, Nevada 89135
Telephone: (702) 948-8771
Facsimile: (702) 948-8773

Shannon Petersen, Esq.
spetersen@sheppardmullin.com

Lisa Yun, Esq.
lyun@sheppardmullin.com
Sheppard Mullin

Sheppard Mullin
12275 El Camino Real
Suite 200
San Diego, CA 92130
Telephone: (858) 720-8900
Facsimile: (858) 523-6731

Pro hac vice pending

Attorneys for Defendant ITT Educational Services, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHONA MARION,

Plaintiff,

V.

ITT EDUCATIONAL SERVICES, INC.
D/B/A ITT TECHNICAL INSTITUTE
D/B/A ITT TECH.

Defendant.

Case No.: 2:16-cv-00585-JAD-GWF

**STIPULATION AND [PROPOSED]
ORDER RE DEADLINE TO RESPOND
TO COMPLAINT (FIRST REQUEST)**

WHEREAS, on March 16, 2016, Plaintiff commenced this action by filing a Complaint in this court (*docket no. 1*);

WHEREAS, Defendant's response to the Complaint is currently due on April 13, 2016;

WHEREAS, the parties have agreed to extend the deadline for Defendant to answer, move against, or otherwise respond to the Complaint to and including May 6, 2016; and,

1 WHEREAS, this is the first request for an extension of time.

2 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG THE
3 PARTIES HERETO THROUGH THEIR COUNSEL OF RECORD that the deadline for
4 Defendant to answer, move against, or otherwise respond to the Complaint shall be May 6, 2016.
5 The parties respectfully request the Court's entry of an Order extending Defendant's deadline as
6 set forth above.

7 Dated this 12th day of April, 2016.

8 HAINES & KRIEGER, LLC

9 /s/*David H. Krieger* _____
10 David H. Krieger, Esq.
Nevada Bar No. 9086
dkrieger@hainesandkrieger.com
11 8985 S. Eastern Avenue
Suite 350
12 Henderson, Nevada 89123
Telephone: (702) 880-5554
13 Facsimile: (702) 385-5518

14 Attorneys for Plaintiff

SANTORO WHITMIRE

9 /s/*Nicholas J. Santoro* _____
10 Nicholas J. Santoro, Esq.
Nevada Bar No. 0532
nsantoro@santoronevada.com
11 10100 W. Charleston Boulevard
Suite 250
12 Las Vegas, NV 89135
Telephone: (702) 948-8771
13 Facsimile: (702) 948-8773

14 Shannon Petersen, Esq.
spetersen@sheppardmullin.com
15 Lisa Yun, Esq.
lyun@sheppardmullin.com
16 Sheppard Mullin
12275 El Camino Real
Suite 200
17 San Diego, CA 92130
Telephone: (858) 720-8900
Facsimile: (858) 523-6731
18 *Pro hac vice pending*

19 Attorneys for Defendant

20 * * * * *

21 IT IS SO ORDERED:

22 
23 _____
24 United States Magistrate Judge

25 Dated: April 13, 2016 _____
26